

EXHIBIT “D”

U.S. PATENT NO. 7,292,870

'870 Patent, Claim 20 Language	Defendants' Smartphones
<p>Claim 20. A method for managing wireless network access and</p> <p>instant messaging</p> <p>through a wireless access point</p> <p>with a handheld instant messaging terminal</p> <p>comprising:</p>	<p>The smartphones are or were available through a number of sources, including through the carriers AT&T, Sprint, T-Mobile, U.S. Cellular, and Verizon.</p> <p>Defendants' own websites feature a number of products, including their respective smartphones.</p> <p>Defendants' smartphones are reported to have "IM" capability. In this context, "IM" stands for "Instant Messaging." In fact, it has been stated that "Instant Messaging has taken the world by storm dislodging conventional techniques of communication and becoming the most popular way of real-time communication." Further, a number of studies have shown that the ability to do instant messaging is a major reason why customers purchase wireless telephony handsets.</p> <p>"Hangouts" is an instant messaging application that was initially released on May 15, 2013. Further, it has been represented that "Hangouts" is/was built into every Android phone that has Google Play Services, and instant messaging is another.</p> <p>In the event that Hangouts was not already pre-installed onto Defendants' Android smartphone it can/could easily be obtained and downloaded for free from a number of websites.</p> <p>Defendants also provide a link to the Google Play Store that, in turn, offers a number of other Android messaging apps for their smartphones.</p> <p>And, for the apparent convenience of the user, Defendants include an icon for "Play Store" directly on the home screen of their smartphones.</p> <p>It is well-known in the art that Defendants' smartphones connect to a Wi-Fi network.</p> <p>Defendants' smartphones are handheld instant messaging terminals.</p> <p>The word "comprising" terminating the preamble of a patent claim means "including, but not necessarily limited to."</p>

entering textual characters and graphical symbols with a data entry device of a handheld terminal to form instant messages for delivery to an instant messaging service;	Defendants' smartphones feature an integral data entry device that allows a user to enter both textual characters and graphical symbols.
displaying the entered textual characters and graphical symbols on a display of the handheld terminal;	Defendants' smartphones include a display that allows the user to see the entered textual characters and graphical symbols.
communicating instant messages with a wireless, Internet protocol access point, the instant messages being communicated with a communications module and wireless transceiver in the handheld terminal;	Defendants' smartphones communicate instant messages with and through a wireless, Internet protocol access point with a communications module and a wireless transceiver in Defendants' smartphones.
coordinating authentication for coupling the handheld instant messaging terminal to a local network through the wireless, Internet protocol access point;	Defendants' smartphones coordinate authentication for coupling the smartphone to a local network through the wireless, Internet protocol access point.
implementing instant messaging and session protocols to control a conversation session through the wireless, Internet protocol access point, the instant messaging and session protocols being	<p>Defendants' smartphones implement instant messaging and session protocols to control a conversation through the wireless, Internet protocol access point.</p> <p>The instant messaging and session protocols are implemented within Defendants' handheld smartphones.</p>

implemented within the handheld instant messaging terminals;	
displaying conversation histories for active conversations terminated by a loss of a network connection; and	Defendants' smartphones display conversation histories for active conversations terminated by a loss of a network connection.
automatically searching for wireless, Internet protocol network beacons after the conversation histories are displayed.	Defendants' smartphones automatically search for accessible Wi-Fi networks after the display of the conversation histories.